

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Mail Processing Network :  
Rationalization Service : Docket No. N2012-1  
Changes, 2012 :

GREETING CARD ASSOCIATION FOLLOWUP INTERROGATORY  
TO POSTAL SERVICE WITNESS WILLIAMS

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Followup interrogatory to Postal Service witness Williams: GCA/USPS-T1-6

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media). If necessary, an interrogatory may be redirected to another witness, or to the Postal Service, in the interest of a complete and accurate response.

February 10, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T1-6

Please refer to your response to GCA/USPS-T1-2, filed on January 10, 2012.

You state in the above-cited response that you have been informed that the Postal Service has not considered a market-dominant price increase “that would exclude First-Class Mail” either as an alternative to the service changes at issue here or as a deficit reduction measure. Please expand your response to cover any explicit consideration of measures which would seek increased levels of processing and delivery infrastructure funding from other classes of mail without necessarily excluding First-Class Mail (e.g., by altering the relative contribution levels of the various classes).